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APCO

August 31, 2010

Linn County Public Health Air Quality Division  
501 - 13th Street NW  
Cedar Rapids, IA 52405-3700

NESHAP Coordinator  
Iowa Department of Natural Resources  
7900 Hickman Road, Suite #1  
Windsor Heights, IA, 50324

Director, Air and Waste Management Division,  
U.S. Environmental Protection Agency  
901 N. 5th Street  
Kansas City, KS 66101

**Subject: NESHAP 40 CFR 63 Subpart ZZZZ - Initial Notification**  
Penford Products Co. (CDS 00185, Facility File No. 57-01-025, EIQ 92-9185)

The purpose of this letter is to provide initial notification (see attached form).  
If you have any questions, please contact me at (319) 398-3700.

Sincerely,

Liane Kroemer  
Senior Environmental Engineer

Enclosure: Initial Notification for Compression Ignition Engines

cc: Chuck Duthler, Corporate Director EHS, Penford Products Co.



**Public Health**  
Prevent. Promote. Protect.  
Linn County, Iowa

LINN COUNTY PUBLIC HEALTH  
AIR QUALITY DIVISION

## Initial Notification for Compression Ignition Engines<sup>a</sup>

**NESHAP for Reciprocating Internal Combustion Engines**  
40 Code of Federal Regulations (CFR) 63.6580 – 63.6675 (Subpart ZZZZ)

### Facility Information

Company Name:	Facility Name (if different):		Facility Number (if known):	
Penford Products Co.			00185	
Equipment Location - Street:	City:	State:	Zip:	
1001 First Street SW	Cedar Rapids	IA	52404	
Mailing Address (if different)	City:	State:	Zip:	
Person to Contact:	Phone Number:	Email (if available)		
Liane Kroemer	319-398-3700	lkroemer@penford.com		

This facility is a (please choose one):

- ☐ Major source: potential or actual emissions greater than 10 tons of any single hazardous air pollutant (HAP) or 25 tons of a combination of HAP
- ☒ Area source: potential and actual emissions below major source levels

### Identification of Standard

- ☒ Yes, this facility is subject to 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines* (RICE NESHAP):

<sup>a</sup> This is an example of the type of information that must be submitted to fulfill the Initial Notification requirement of 40 CFR 63, Subpart ZZZZ. You may submit the information in another form or format, or you may use this form.

## Engine Data

Emission Unit Number	Emission Unit Description	Is this an emergency engine?	Construction Date	Engine Model Year	Brake Horsepower (bhp)
13PU095201	Fire Pump (EP105)	Yes	10/1/2007	2007	288

This fire pump is subject to NSPS IIII. No additional requirements.

95-GENERATOR	Standby Diesel Generator (EP625)	No	1990	~ 1990	465
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This standby generator was damaged in the 2008 flood and has not been used since.

Penford no longer intends to repair this generator. A request to rescind the permit will be submitted to Linn County.

The other diesel engines owned and operated by Penford are existing units less than 300 bhp.

Existing units: Initial notifications are required to be submitted by August 31, 2010 for the following:

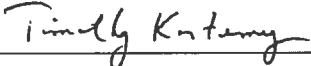
Area sources: Non-emergency engines > 300 bhp, installed before June 12, 2006

Major sources: Non-emergency engines > 500 bhp, installed before December 19, 2002, and  
Non-emergency engines > 100 and ≤ 500 bhp, installed before June 12, 2006

New units: Initial notifications are required to be submitted within 120 days of startup for the following:

Major sources: All engines > 500 bhp installed on or after December 19, 2002

## Signature

Responsible Official Certification		
<input checked="" type="checkbox"/>	I certify the truth, accuracy, and completeness of this notification.	
Responsible Official Name	Responsible Official Signature	Date
Tim Kortemeyer		8/31/10

Submit this notification to the following agencies:

- Director, Air and Waste Management Division, U.S. Environmental Protection Agency, 901 N. 5th Street, Kansas City, KS 66101
- NESHAP Coordinator, Iowa Department of Natural Resources, 7900 Hickman, Suite 1; Windsor Heights, IA, 50324
- Linn County Public Health – Air Quality Division, 501 13<sup>th</sup> Street NW; Cedar Rapids, IA, 52405